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VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

In Re: Dominion Energy South Carolina, Incorporated's 2021 Avoided Cost Proceeding
Pursuant to S.C. Code Ann. Section 58-41-20(A) (Docket No. 2021-88-E)

Dear Ms. Boyd,

The South Carolina Coastal Conservation League ("CCL") and Southern Alliance for Clean Energy ("SACE") submit this letter in support of the Carolinas Clean Business Association ("CCEBA") motion for an extension of time to file Direct Testimony in this proceeding. In the alternative, CCL and SACE respectfully request that they, along with other intervenors, be permitted to file supplemental direct testimony.

Dominion Energy South Carolina's ("DESC" or "Company") actions in this docket have put the intervenors, as well as the Commission, at a continuous disadvantage. DESC began this proceeding by filing a deficient application on April 22, 2021, proposing to supplement the application with key information when it filed its direct testimony on June 29, 2021. Under this procedural proposal, the intervenors would have had just two weeks before submitting direct testimony to review the "underlying data assumptions, data, and results" that were statutorily required to be in the DESC's April 22 avoided cost filing. Accordingly, the Commission rejected this proposal and ordered DESC to file a supplemental application by June 7, 2021 that included, among other items, the Company's proposals for its "avoided cost methodologies." *See* Order 2021-384.

Over two weeks after filing its supplemental application, DESC filed a second supplemental application on June 25, 2021—just four days before its direct testimony was due. Not only does this filing suggest a disregard for the Commission's Order rejecting DESC's initial procedural proposal, it puts intervenors at an even greater disadvantage. DESC's second supplemental application, among other changes, altered the Variable Integration Charges and DESC's proposed Standard Offer rates and contract terms. As such, DESC has continued to alter their proposal with information that should have been included in their initial application—changing the numbers up until the last minute—even as intervenors are attempting to pull together direct testimony on a condensed timeline.

In addition, and despite DESC's two supplemental applications and recently filed direct testimony, the intervenors continue to be disadvantaged by the lack of key

“assumptions, data, and results” in DESC’s avoided cost filings. *See* S.C. Code Ann. § 58-41-20(J). For example, DESC does not identify which load forecast or natural gas price assumptions underlie its proposal. Moreover, its testimony contains no support for the pricing periods used to develop the avoided cost rates, in direct contrast to the Commission’s requirement that DESC provide “additional justification for pricing periods...in future filings.” Order No. 2019-847 at 26. DESC’s deficient filings also reflect a failure to comply with the Commission’s 2019 directive ordering “[DESC] to present substantially more information about the underlying assumptions and data, such that the parties to such future proceeding may more meaningfully evaluate and analyze the methodologies and models employed by the utility,” and leave the intervenors in the same disadvantaged position as two years ago. *See* Order dated Nov. 15, 2019, Dkt. 2019-184-E.

CCL and SACE do not make this request lightly. Though CCL and SACE are well aware of the Commission’s busy hearing schedule and the statutorily required time frames under which the Commission is required to approve DESC’s avoided cost application, intervenors in this docket have thus far been unable to “review[] and verify[y]” the “underlying assumptions, data, and results” of DESC’s avoided cost filing, as required under the Energy Freedom Act. *See* S.C. Code Ann. § 58-41-20(J). Ultimately, DESC’s incomplete and delayed filings have turned this docket—an incredibly important one that has the potential to impact ratepayers and build a clean energy future—into a waiting game, forcing parties to dispute procedural issues rather than the substance of DESC’s avoided cost rates.

Were the Commission to grant this request, CCL and SACE recommend pushing back each of the subsequent testimony deadlines and the hearing date by two weeks as the most straightforward and fairest solution. However, in the alternative, CCL and SACE request that they be permitted to submit supplemental direct testimony on July 26, 2021, and that the Commission give DESC until August 3, 2021, to file rebuttal testimony and the intervenors until August 16, 2021 to file surrebuttal testimony.

Sincerely,

s/Kate Lee Mixson

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CERTIFICATE OF SERVICE

I hereby certify that the parties listed below have been served via first class U.S. Mail or electronic mail with a copy of the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy's *Letter in Support of CCEBA's Motion for Extension for Time to File Direct Testimony*.

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This 8th day of July, 2021.

s/Kate Lee Mixson